

**STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION**

Joint Application and Petition of South)
 Carolina Electric & Gas Company and)
 Dominion Energy, Incorporated for Review)
 and Approval of a Proposed Business)
 Combination between SCANA Corporation)
 and Dominion Energy, Incorporated, as May)
 Be Required, and for a Prudency Determination))
 Regarding the Abandonment of the V.C.)
 Summer Units 2 & 3 Project and Associated)
 Customer Benefits and Cost Recovery Plans)
 _____)

Docket No. 2017-370-E

PETITION TO INTERVENE OF AARP

AARP¹, by and through counsel, pursuant to R. 103-825 of the Commission's rules, respectfully petitions the South Carolina Public Service Commission ("Commission") for formal intervention as a party in the above-captioned matter. In support of this petition, AARP states as follows:

1. AARP, with its nearly 38 million members in all 50 States and the District of Columbia, Puerto Rico, and U.S. Virgin Islands, is a nonpartisan, nonprofit, nationwide organization that helps people turn their goals and dreams into real possibilities, strengthens communities and fights for the issues that matter most to families such as healthcare, employment and income security, retirement planning, affordable utilities and protection from financial abuse. AARP has 621,000 members in South Carolina, many of whom are residential electric customers of South Carolina Electric & Gas Company ("SCE&G" or "Company").

¹In 1999, the "American Association of Retired Persons" changed its name to simply "AARP", in recognition of the fact that people do not have to be retired to become members.

2. AARP's interest in this matter and its grounds for intervention relate to the substantial impact on residential electric rates related to the potential merger and requested recovery of costs associated with the VC Summer Nuclear Plant. AARP takes no position at this time either for or against the proposed merger; AARP desires to advocate in this matter on behalf of residential electric customers to ensure that whatever provisions or conditions that may be adopted in this matter are prudent, fair, just and reasonable.

More specifically, AARP's interest relates to how the joint Petition of Dominion Energy and SCANA, if granted, may cause significant rate increases for all SCE&G ratepayers. Some residential customers are impacted most directly by increases in energy prices. Many consumers also devote a higher percentage of their total spending than do other age groups towards residential energy costs. AARP wishes to ensure that residential energy customers, including those over age 50 and their families, are protected from continuing to pay for the abandoned nuclear power project at VC Summer.

3. On January 8, 2018, a joint petition filed by SCE&G and Dominion Energy created this docket. AARP is concerned that the merger may negatively impact the rates for electric service on behalf of its members. By granting the request to allow a merger which allows Dominion Energy to continue to collect increased rates for electricity under the Base Load Review Act, the Public Service Commission would be ensuring higher electric rates for SCE&G's customer for at least 20 more years. AARP believes that the Commission has an overriding obligation to reject this Petition as stated and refuse to force ratepayers to continue funding this abandoned project.

SCE&G has been requesting and receiving rate increases for building this "power plant" since 2008. In all they have increased the residential rate by \$27.03, as part of an overall increase in revenue of \$445,000,978.00. This revenue has been squandered by SCE&G and resulted in the proposed purchase and merger by Dominion.

While AARP is not opposed to a merger *per se*, AARP opposed the merger as proposed by the petitioners which would force ratepayers to continue paying for the failed nuclear project. AARP reserves the right to address other significant issues that may arise during the course of this proceeding.

4. AARP's specific interest in this proceeding will not be adequately represented by other parties. AARP believes that its intervention and participation in this proceeding would serve the public interest and wishes to become a party to this case for all purposes. Moreover, AARP can assure that its intervention would not unduly delay the proceedings nor prejudice the rights of any other party.

5. AARP is represented by the following counsel in this proceeding:

Susan B. Berkowitz
South Carolina Appleseed Legal Justice Center
PO Box 7187
Columbia, SC 29202
(803) 779-1113

John B. Coffman (*pro hac vice* to be filed)
John B Coffman, LLC
871 Tuxedo Blvd.
St. Louis, MO 63119-2044

WHEREFORE, AARP respectfully requests that the Commission grant its Petition to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Susan B. Berkowitz", written over a horizontal line.

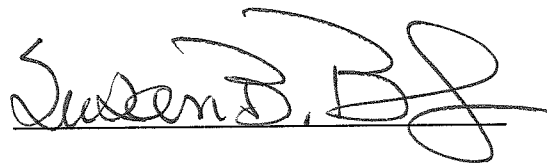
Susan B. Berkowitz
SC Appleseed Legal Justice Center
PO Box 7187
Columbia, SC 29202
(803) 779-1113

Attorney for AARP

Dated: March 9, 2018

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to office service list in Docket No. 2017-370-E at the South Carolina Public Service Commission on this 12 day of March, 2018.



Subscribed and sworn to before me

This 12 day of March, 2018

KALEN REED
Notary Public, State of South Carolina
My Commission Expires 2/21/2024